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14  
15

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO/OAKLAND DIVISION

19 ROY ADAMS, ROBERT EGGERT,  
MICHAEL FERRIS, ED HALL, ROHIT  
20 SINGH, DUJUAN NICKSON, and  
DONTRELL BUNTER, on behalf of  
21 themselves and a class of those similarly  
situated,

22 Plaintiffs,

23 v.

24 INTER-CON SECURITY SYSTEMS,  
INC., d/b/a INTER-CON SECURITY  
25 SERVICES, INC.,

26 Defendant.  
27  
28

Case No. C-06-5428 MHP

STIPULATION AND [PROPOSED] ORDER  
RE MAILING AND POSTING OF NOTICE  
RE FLSA CLAIM

Hon. Marilyn Hall Patel

1 WHEREAS, the Inter-Con employees working at California Highway Patrol facilities  
2 were not covered by a Collective Bargaining Agreement before March 24, 2006;

3 WHEREAS, Plaintiffs reserve the right to ask the Court to designate an FLSA subclass of  
4 Inter-Con employees working at California Highway Patrol facilities after March 24, 2006 subject  
5 to a Collective Bargaining Agreement, and reserve the right to ask for broader equitable tolling  
6 for that group than what is provided for in this stipulation;  
7

8 WHEREAS, the Parties have revised the Proposed Notice of FLSA Claim in accordance  
9 with the Court's April 6, 2007 Order,

10 The Parties hereby stipulate and agree as follows:

- 11 1. The Notice attached as Exhibit A is approved as to form;
- 12 2. The Collective Class to whom the Notice is mailed will include Inter-Con  
13 employees who worked at California Highway Patrol facilities prior to March 24, 2006;  
14
- 15 3. The Notice will be posted at California Highway Patrol facilities with fifteen or  
16 more security guards;
- 17 4. The Statute of limitations on the Fair Labor Standards Act claim of Inter-Con  
18 employees working at California Highway Patrol facilities after March 24, 2006 shall be tolled  
19 from May 10, 2007 through July 3, 2007.  
20

21 Dated: May 11, 2007

By: /s/  
James M. Finberg

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*Attorneys for the Plaintiffs and the Proposed  
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Dated: May 11, 2007

By: /s/  
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*Attorneys for the Defendant  
Inter-Con Security System*

1 ORDER

2 The Foregoing Stipulation is approved, and IT IS SO ORDERED.

3  
4  
5 Dated: 5/17/2007

